Mr. Michael Elliot
Jasper Seating, Inc.
P.O. Box 231
Jasper, IN 47547-0231

Re: 037-10701
Significant Source Modification to:
Part 70 permit No.: T037-5805-00010

Dear Mr. Elliot:

Jasper Seating, Inc. was issued Part 70 operating permit T037-5805-00010 on December 21, 1998 for a stationary wood office furniture (chair) manufacturing plant. An application to modify the source was received on February 25, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source (changes are crossed out and bolded for emphasis):

(1) Eleven (11) surface coating operations, consisting of the following:
- (a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and
- (b) seven (7) spray booths, with dry filters for particulate control identified as:
  - (ii) ~~EU-05 and~~ EU-06 with a maximum unit capacity of 40 chairs per hour, ~~EU-05 exhausts to S/V-05~~ **and** EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and
  - (ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V -12.
  - **(iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V-05.**
- **(c) Three (3) wood furniture HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.**

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317)233-6875

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
NLJ
cc: File - Dubois County
U.S. EPA, Region V
Dubois County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Ray Schick
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Jasper Seating, Inc.
932 Mill Street, P.O. Box 231
Jasper, Indiana 47547-0231

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-5805-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 21, 1998
First Significant Source Modification: T-037-10701	Pages Affected: 3,5-6,29-34 and 43
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]
C.11 Compliance Schedule [326 IAC 2-7-6(3)]

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood office furniture (chair) manufacturing plant.

Responsible Official:	Jasper Seating, Inc.
Source Address:	932 Mill Street, P.O. Box 231, Jasper, Indiana 47547-0231
Mailing Address:	932 Mill Street, P.O. Box 231, Jasper, Indiana 47547-0231
SIC Code:	2521
County Location:	Dubois County
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Eleven (11) surface coating operations, consisting of the following:

(a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and

(b) seven (7) spray booths, with dry filters for particulate control identified as:
(i) EU-06 with a maximum unit capacity of 40 chairs per hour and EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and
(ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V-12.
(iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V-12.

(c) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.

(2) One (1) 10.46mmBtu per hour natural gas fired boiler, identified as EU-01, exhausting to stack vent S1.

(3) One (1) 9.28mmBtu per hour wood fired boiler, identified as EU-02, exhausting to stack vent S2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(b) Woodworking identified as EU-13, controlled by three (3) baghouses and two (2) cyclones in series, exhausting to stack vent V13 through V15.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Eleven (11) surface coating operations, consisting of the following:

(a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and

(b) seven (7) spray booths, with dry filters for particulate control identified as:

(i) EU-06 with a maximum unit capacity of 40 chairs per hour and EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and

(ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V -12.

(iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V-12.

(c) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The surface coating operations identified as EU-03, through EU-06, EU-08 through EU-12, EU-14 and EU-15 shall be limited to 242.6 tons of VOC per twelve (12) consecutive months, rolled on a monthly basis, including coatings dilution solvents and cleaning solvents. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

(b) During the first 12 months of operation, the potential to emit of VOC shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 20.22 tons per month.

D.1.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.3 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.
(b) Leak inspection and maintenance plan.
(c) Cleaning and washoff solvent accounting system.
(d) Chemical composition of cleaning and washoff solvents.
(e) Spray booth cleaning.
(f) Storage requirements.
(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(h) Line cleaning.
(i) Gun cleaning.
(j) Washoff operations.
(k) Formulation assessment plan for finishing operations.

D.1.4 Best Available Control Technology [326 IAC 8-1-6]

Pursuant to PC (19) 1688, issued June 10, 1988, surface coating booth EU-06 shall:

(a) use air assisted airless spray guns for surface coating and

(b) the volatile organic solvent content in the coatings shall be limited to 7.0 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating operations designated as EU-03 through EU-05, EU-08 through EU-12, EU-14 and EU-15 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.6 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitation), the surface coating operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic foot (g/dscm((0.03 grain per dry standard cubic foot (dscf)).

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1), (6)]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.1.1, D.1.2, and D.1.5 shall be determined by performance tests conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan and the Work Practice Implementation Plan.

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the ten (10) surface coating booths (EU-04, EU-05, EU-06, and EU-08 through EU-12, EU-14 and EU-15) are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.2.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(c) To document compliance with Condition D.1.3, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(d) To document compliance with Condition D.1.4, the Permittee shall maintain a log of the quantities, densities, and organic solvent contents of all coatings, and solvent thinners and cleaners used. These records shall be kept for at least the past twenty-four month period and made available upon request of the Office of Air Management.

(e) To document compliance with Condition D.1.6, D.1.10, and D.1.11 the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

(a) An Initial Compliance Report to document compliance with Condition D.1.2, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of November 21, 1997. The initial compliance report must include data from the entire month that the compliance date falls.

(b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.2, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

For the first year following the compliance date, the Continuous Compliance Reports shall cover the following months:

(1) November 21, 1997 through May 20, 1998.

(2) May 21 through November 30. 1998..

(3) December 1 through December 31, 1998.

(c) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(d) The reports required in (a) and (b) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(e) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Jasper Seating, Inc.
Source Address: 932 Mill Street, Jasper, Indiana 47547-0231
Mailing Address: P.O. Box 231, Jasper, Indiana 47547-0231
Part 70 Permit No.: T037-5805-00010
Facility: Surface Coating Booths
Parameter: EU-03 through EU-06, EU-08 through EU-12, EU-14 and EU-15
Limit: 242.6 tons of VOC per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Usage (tons/ month)	Usage for previous month (tons)	Usage for previous twelve month period (tons)	Emissions (tons/ month)	Emissions for previous month (tons)	VOC Emissions for previous twelve month period (tons)

□ No deviation occurred in this month.
□ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Significant Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Jasper Seating, Inc.
Source Location:	932 Mill Street, Jasper, Indiana 47547-0231
County:	Dubois
SIC Code:	2521
Operation Permit No.:	T-037-5805-00010
Operation Permit Issuance Date:	December 21, 1998
Source Modification No.:	T-037-10701-00010
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a modification application from Jasper Seating, Inc. relating to the operation of a wood office furniture (chair) manufacturing plant.

History

On February 25, 1999, Jasper Seating, Inc. submitted an application to the OAM requesting to add three (3) new wood furniture paint booths and modify one (1) existing wood furniture paint booth to their existing plant. Jasper Seating, Inc. was issued a Part 70 permit on December 21, 1998.

Existing Approvals

This is the first modification to the source since the Part 70 Permit was issued on December 21, 1998.

The first significant source modification consists of the following (changes are crossed out and bolded for emphasis):

1. Condition A.2, Emission Units and Pollution Control Equipment Summary located on page 5 of 46, is amended to reflect the three (3) new paint booths and the modification of EU-05 and is the following (changes are crossed out and bolded for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Eight (8) surface coating operations, consisting of the following:

(a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and

(b) seven (7) spray booths, with dry filters for particulate control identified as:

(i) ~~EU-05 and~~ EU-06 with a maximum unit capacity of 40 chairs per hour, ~~EU-05 exhausts to S/V-05~~ **and** EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and

(ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V -12.

(iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V 12.

~~(2) Woodworking identified as EU-13, controlled by three (3) baghouses and two (2) cyclones in series, exhausting to stack vent V13 through V15.~~

(2) One (1) 10.46mmBtu per hour natural gas fired boiler, identified as EU-01, exhausting to stack vent S1.

(3) One (1) 9.28mmBtu per hour wood fired boiler, identified as EU-02, exhausting to stack vent S2.

(4) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.

2. Condition A.3, Specifically Regulated Insignificant Activities located on page 6 of 46, is amended to reflect that the woodworking activities is an insignificant activity as defined under 326 IAC 2-7-1(21)(G)(xxix)(changes are crossed out and bolded for emphasis):

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(b) Woodworking identified as EU-13, controlled by three (3) baghouses and two (2) cyclones in series, exhausting to stack vent V13 through V15.

3. Facility D.1, located on page 29 of 46, is amended to the following (changes are crossed out and bolded for emphasis):

Facility Description [326 IAC 2-7-5(15)] Eight (8) surface coating operations, consisting of the following:

(a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and

(b) seven (7) spray booths, with dry filters for particulate control identified as:

(i) ~~EU-05 and~~ EU-06 with a maximum unit capacity of 40 chairs per hour, ~~EU-05 exhausts to S/V-05~~ **and** EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and

(ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V -12.

(iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V 12.

(c) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.

4. Condition D.1.1, PSD Minor Limit located on page 29 of 46, is amended to reflect the new emission units and modification of an existing emission unit (changes are crossed out and bolded for emphasis):

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) ~~Pursuant to CP-037-8869-00010, issued on January 14, 1998, t~~**T**he surface coating operations identified **as** EU-03, ~~EU-05,~~ **through** EU-06, ~~and~~ EU-08 through EU-12**, EU-14 and EU-15** shall be limited to ~~20.22 tons of VOC~~ **242.6 tons of VOC per twelve (12) consecutive months, rolled on a monthly basis**, including coatings dilution solvents and cleaning solvents ~~per month~~. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

(b) During the first 12 months of operation, the potential to emit of VOC shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 20.22 tons per month.

5. Condition D.1.5, Volatile Organic Compounds located on page 31 of 46, is amended to the following (changes are crossed out and bolded for emphasis):

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), ~~five (5) spray coating booths, identified as~~ **the surface coating operations designated as EU-03 through EU-05,** EU-08 through EU-12, **EU-14 and EU-15** shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

6. Condition D.1.6, Particulate Matter (PM) [326 IAC 6-3-2(c)] located on page 31 of 46, is amended to the following (changes are crossed out and bolded for emphasis):

D.1.6 Particulate Matter (PM) [326 IAC ~~6-3-2(c)~~ **6-1-2**]

~~Pursuant to 326 IAC 6-3-2 the PM from the eight surface coating booths identified as EU-03,EU-05, EU-06, and EU-08 through EU-12, shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour~~

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitation), the surface coating operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic foot (g/dscm((0.03 grain per dry standard cubic foot (dscf)).

7. Since the VOC limit established under Condition D.1.1 is an annual limit, Condition D.1.10, Visible Emissions located on page 32 of 46, is deleted from the Part 70 Permit. Compliance with this limit shall be demonstrated on an annual basis, rolled monthly. All conditions following this condition shall be re-numbered accordingly.

8. Condition D.1.12, now re-numbered as D.1.11, Particulate Matter (PM) located on page 32 of 46, is amended to the following (changes are crossed out and bolded for emphasis):

D.1.12 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the ~~seven (7)~~ **ten (10)** surface coating booths (**EU-04**, EU-05, EU-06, and EU-08 through EU-12, **EU-14 and EU-15**) are in operation.

9. Condition D.1.13(e), now re-numbered as D.1.12, Record Keeping requirements located on pages 32 and 33 of 46, is amended to the following (changes are crossed out and bolded for emphasis):

(e) To document compliance with Condition D.1.6, ~~D.1.11~~ **D.1.10**, and ~~D.1.12~~ **D.1.11,** the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

10. The quarterly report form, located on page 43 of 46, is amended to reflect the new booths and the corresponding limit for all of the surface coating operations.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
V-4	paint booth EU-4	20	2.5	6250	Ambient
V-5	paint booth EU-5	20	2.5	6250	Ambient
V-16	paint booth EU-14	20	2.8	8600	Ambient
V-17	paint booth EU-14	20	2.8	8600	Ambient
V-18	paint booth EU-15	20	2.8	8600	Ambient

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 25, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages)

Each paint booth could use either the sealer, washcoat, laquer, stain or NGR. Since the source would like to have the flexibility to use any coating in any of the booths, the worst case VOC emissions were based on the laquer which was the worst case for VOC emissions. The total VOC potential to emit was then based upon each booth using the laquer all the time. The HAP emissions were based on worst case of the laquer, washcoat and sealer.

Paint booth designated as EU-05 was originally permitted at a maximum throughput of 40 units per hour and one (1) gallon per hour of laquer. The potential to emit of this modification shall be based on 125 units per hour which is an increase of 85 units per hour and based on using any of the above mentioned coatings.

VOC PTE for EU-05 -

VOC PTE = Future potential to emit - Past potential to emit
= 1848.32 tons per year - [(1 gal/hr * 7.7 lb/gal *0.769 (VOC content)) * 8760 hr/yr * ton/2000 lb) = 1822.39 ton/yr.

HAP PTE for EU-05 -

Xylene PTE = Future potential to emit - Past potential to emit
= 262.77 tons per year - [(1 gal/hr * 7.7 lb/gal * 0.109 (Xylene content)) * 8760 hr/yr * ton/2000 lb) = 259.1 tons per year.

Ethyl Benzene = Future potential to emit - Past potential to emit
= 62.68 tons per year - [(1 gal/hr * 7.7 lb/gal * 0.026 (EB content)) * 8760 hr/yr * ton/2000 lb) = 62.0 tons per year.

MIK = Future potential to emit - Past potential to emit
= 81.98 tons per year - [(1 gal/hr * 7.7 lb/gal * 0.034 (MIK content)) * 8760 hr/yr * ton/2000 lb) = 80.8 tons per year.

Since the paint booth EU-05 was not previously permitted to use the sealer or washcoat, the potential to emit of the HAPs from these coatings are reflected on page 2 of 2 of the emission calculation spreadsheets.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	556.16
PM-10	556.16
SO_2	--
VOC	7367.35
CO	--
NO_x	--

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	1057.4
Toluene	920.6
Formaldehyde	8.00
Ethyl Benzene	248.04
MIK	326.68
TOTAL	2560.72

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM/PM_{10} are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	13.22
PM-10	11.87
SO_2	0.23
VOC	125.12
CO	6.25
NO_x	2.00

DEHP	0.26
Ethyl Benzene	1.43
Methanol	11.43
MEK	5.98
MIK	3.35
Toluene	8.68
Vinyl Acetate	0.01
Xylene	10.24
Glycol Ethers	0.63
Total	41.89

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	43.35
PM10	43.35
SO_2	0.68
VOC	242.6
CO	17.83
NO_x	8.90

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on the Part 70 Permit (T-037-5805-00010), issued on December 21, 1998 and Construction Permit (CP-037-8869-00010), issued on January 14, 1998).

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	111.2	111.2	--	242.6*	--	--
PSD or Offset Threshold Level	250	250	250	250	250	250

* All of the surface coating operations are limited to 242.6 tons per year which includes the three (3) new paint booths and the modification of paint booth EU-05.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status **(attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)**
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) 40 CFR 63, Subpart JJ [Wood Furniture NESHAP]
Pursuant to 326 IAC 20-14-1 and 40 CFR Part 63, Subpart JJ:

(1) The new wood furniture coating operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of upon startup.

(2) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(A) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(2) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.
Use compliant finishing materials in which all wash-coats, sealers, topcoats, base-coats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of wash-coats, base-coats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(4) Use a combination of (A), (B), and (C).

(B) Limit VHAP emissions contact adhesives as follows:

1. For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.

2. For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

3. Use a control device to limit emissions to 0.2 pound VHAP per pound solids.

(C) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

(3) The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(A) Operator training course.
(B) Leak inspection and maintenance plan.
(C) Cleaning and wash-off solvent accounting system.
(D) Chemical composition of cleaning and wash-off solvents.
(E) Spray booth cleaning.
(F) Storage requirements.
(G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
(H) Line cleaning.
(I) Gun cleaning.
(J) Wash-off operations.
(K) Formulation assessment plan for finishing operations.

(4) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(5) To document compliance with 40 CFR Part 63, Subpart JJ, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with the VHAP usage limits established in 40 CFR Part 63, Subpart JJ.

(A) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(B) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(C) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(D) The VHAP content in weight percent of each thinner used.

(E) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(F) The Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(6) An Initial Compliance Report to document compliance with 40 CFR Part 63, Subpart JJ and the Certification form, shall be submitted within sixty (60) days following the compliance date of upon startup. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(7) A semi-annual Continuous Compliance Report to document compliance with 40 CFR Part 63, Subpart JJ and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

For the first year following the compliance date, the six (6) month period shall begin on the first day of the month after which the operation commences.

(8) Following the first year of reporting, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.

(9) The reports required in (a), (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590.

(c) There are no other NESHAP 40 CFR Part 63 applicable to this facility.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration):

Pursuant to the source's Part 70 permit (T-037-5805-00010), issued on December 21, 1998, the potential to emit of VOC from the eight (8) coating operations shall be limited to 242.6 tons per twelve (12) consecutive months, rolled on a monthly basis. The source has requested to maintain this limit with the new paint booths (EU-04, 14 and 15) and the modification to paint booth EU-05.

The surface coating operations designated as EU-03 through EU-06, EU-08 through EU-12, EU-14 and EU-15 shall be limited to 242.6 tons per twelve (12) consecutive months, rolled on a monthly basis. During the first 12 months of operation, the potential to emit of VOC shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 20.22 tons per month.

Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of particulate matter and volatile organic compounds (VOCs). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Spray Booths (EU-04, EU-05, EU-14 and EU-15)

326 IAC 2-4.1-1 (New Source Toxics Control):

Since these paint booths are specifically regulated by 40 CFR Part 63, Subpart JJ (Wood Furniture NESHAP), 326 IAC 2-4.1-1 does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration):

The surface coating operations designated as EU-03 through EU-06, EU-08 through EU-12, EU-14 and EU-15 shall be limited to 242.6 tons per twelve (12) consecutive months, rolled on a monthly basis.

During the first 12 months of operation, the potential to emit of VOC shall be limited such that the total emissions divided by the accumulated months of operation shall be less than 20.22 tons per month.

Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

326 IAC 6-1-2 (Nonattainment Area Limitation):

Since this source is located in Dubois County and the actual emissions of the source exceed 10 tons per year, 326 IAC 6-1-2 is applicable.

(a) Pursuant to 326 IAC 6-1-2 (Nonattainment Area Limitation)**,** any general source shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic foot (g/dscm((0.03 grain per dry standard cubic foot (dscf)).

(b) The dry filters for particulate matter overspray control shall be in operation at all times when the wood furniture paint booths are in operation.

(c) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation.

(d) Monthly inspections shall be performed of the wood finishing paint line emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

(e) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

326 IAC 6-3 (Process Operations) does not apply to the paint booths because the entire source is already subject to 326 IAC 6-1-2 because the actual emission are 10 tons per year or more.

326 IAC 8-2-12 (Wood Furniture and Cabinet coating):

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet coating), the surface coatings applied to wood furniture and/or wood components shall utilize one or more of the following application methods:

Airless Spray Application	Air-Assisted Airless Spray Application
Electrostatic Spray Application	Electrostatic Bell or Disc Application
Heated Airless Spray Application	Roller Coating
Brush or Wipe Application	Dip-and-Drain Application
High Volume Low Pressure HVLP	Aerosol Spray Cans

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-2-11 (Wood furniture coatings):

326 IAC 8-2-11 does not apply to the paint booths because the source is not located in one of the counties specified in the rule.

No other 326 IAC 8 rules apply to the wood furniture paint booths.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The paint booths designated as EU-04, EU-05, EU-14 and EU-15 have applicable compliance monitoring conditions as specified below:

   (a) The dry filters for PM control shall be in operation at all times when the wood furniture paint booths are in operation.

(b) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the spray equipment is in operation.

(c) Monthly inspections shall be performed of the wood furniture paint booths' emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations (page 2 of 2).

Conclusion

The operation of this first significant source modification shall be subject to the conditions of the attached proposed Part 70 Permit No. T 037-10701-00010.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the Technical Support Document for a Significant Source Modification to a Part 70 Operating Permit

Source Name:	Jasper Seating, Inc.
Source Location:	932 Mill Street, Jasper, Indiana 47547-0231
County:	Dubois
SIC Code:	2521
Operation Permit No.:	T-037-5805-00010
Operation Permit Issuance Date:	December 21, 1998
Source Modification No.:	T-037-10701-00010
Permit Reviewer:	Nysa L. James

On April 15, 1999, the Office of Air Management (OAM) had a notice published in the Herald, Jasper, Indiana, stating that Jasper seating, Inc. had applied for a significant source modification to the existing Title V permit which consisted of the addition of three (3) new wood furniture paint booths and the modification of one (1) existing wood furniture paint booth. The notice also stated that OAM proposed to issue a permit for this modification and provided information on how the public could review the proposed significant source modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this significant source modification should be issued as proposed.

On May 11, 1999, Jasper seating, Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded and crossed out for emphasis):

Comment 1: The facility description on pages 29 of 46 (Section D.1) and 2 of 13 of the TSD (3), both refer to eight (8) surface coating operations. This is incorrect, as there are a total of eleven surface coating operations with this modification to our plant.

Response 1: Section D.1, Condition D.1, and the technical support document do list the new equipment under number 4 and shows a total of eleven surface coating booths (the eight (8) existing booths and the three (3) new booths). Since the source is confused on the total number of booths, Condition A.1, Emission Units and Pollution Control Equipment Summary located on page 3 of 46, and Section D.1, Facility Description located on page 29 of 46, are revised to the following (changes are bolded and crossed out for emphasis):

(1) ~~Eight (8)~~ **Eleven (11)** surface coating operations, consisting of the following:

(a) one (1) dip tank identified as EU-03 with a maximum unit capacity of 40 chairs per hour, exhausting to stack vent S/V-03 and

(b) seven (7) spray booths, with dry filters for particulate control identified as:

(i) EU-06 with a maximum unit capacity of 40 chairs per hour and EU-06 exhausts to two (2) stack vents, identified as S/V-06 and S/V-07 and

(ii) EU-08 through EU-12 with a maximum unit capacity of 120 chairs per hour, EU-08 exhausts to S/V-08, EU-09 exhausts to two (2) stack vents, identified as EU-9a and EU-9b, EU-10 through EU-12 exhaust to S/V-10 through S/V-12.

(iii) EU-05 with a maximum unit capacity of 125 chairs per hour and exhausts to S/V-12.

(c) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.

(2) One (1) 10.46mmBtu per hour natural gas fired boiler, identified as EU-01, exhausting to stack vent S1.

(3) One (1) 9.28mmBtu per hour wood fired boiler, identified as EU-02, exhausting to stack vent S2.

~~(4) Three (3) wood furniture air-assisted airless and HVLP spray booths, designated as EU-04, EU-14 and EU-15, with a maximum unit capacity of 125 chairs per hour, particulate matter controlled by dry filters, EU-04 exhausts to a stack designated as V4, EU-014 exhausts to two (2) stacks designated as V16 and V17, and EU-15 exhausts to a stack designated as V18.~~

The Office of Air Management (OAM) corrects permit errors in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 2: In the TSD, 3.(b) repeats twice.

Response 2: After reviewing the technical support document, a repetition of item 3(b) could not be located.

Also, the Office of Air Management (OAM) corrects permit errors in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 3: In the TSD, page 5 of 13 under Emission Calculations, lacquer is spelled wrong.

Response 3: The Office of Air Management acknowledges that lacquer was spelled incorrectly in the Emissions Calculations section. However, this miss-spelling of the word lacquer will not be corrected because the Office of Air Management (OAM) corrects permit errors in the form of a technical support addendum. The original technical support document does not change from the first proposal in order to maintain the integrity of the review process. The technical support document is utilized as a technical tool that allows the source to understand OAM's decision in a more detailed manner. This document is not an enforceable document, but an aid to the source's permit.

Comment 4: On page 8 of 13 of the TSD, Dubois County is designated as attainment for PM-10. We understand that Dubois County is non-attainment county for PM-10.

Response 4: Currently, Dubois county is considered attainment. However, 326 IAC 6-1-2 (Nonattainment Area Limitation) is applicable because the rule lists this county as non-attainment and has not been revised since the county was switched to an attainment status.

Comment 5: We understand that you plan to extend the deadlines for development of our Preventive Maintenance Plan, Emergency Reduction Plan and Compliance Monitoring Plan, as we requested in our March 1999 letter.

Response 5: On March 16, 1999, the Office of Air Management received a request to extend the above referenced deadlines. According to each of the rules for the above mentioned, the source is only required to notify OAM of such extension. Therefore, the Preventive Maintenance Plan, Emergency Reduction Plan and Compliance Monitoring Plan shall be submitted to the appropriate offices of IDEM, listed in the Title V permit, ninety (90) days after issuance of this significant source modification.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Jasper Seating, Inc.
Address City IN Zip: 932 Mill Street, Jasper, Indiana 47574-0231
CP: 037-10701
Plt ID: 037-00010
Reviewer: Nysa L. James
Date: 03/03/99

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Sealer	7.8	65.49%	0.0%	65.5%	0.0%	26.23%	29.29000	5.13	5.13	150.39	3609.29	658.70	86.77	19.57	75%
Washcoat	7.0	89.90%	0.0%	89.9%	0.0%	5.51%	9.60000	6.29	6.29	60.41	1449.91	264.61	7.43	114.21	75%
Stain	7.1	68.60%	0.0%	68.6%	0.0%	25.85%	37.50000	4.86	4.86	182.13	4371.19	797.74	91.29	18.79	75%
Lacquer	7.7	76.87%	0.0%	76.9%	0.0%	16.02%	71.48000	5.90	5.90	421.99	10127.77	1848.32	139.04	36.85	75%
NGR	6.6	99.85%	0.0%	99.9%	0.0%	0.28%	19.45000	6.61	6.61	128.57	3085.58	563.12	0.21	2360.74	75%

Each booth could use any of these solvents at any given time, therefore PTE shall be based on each booth using Lacquer at all times (worst case emissions).

State Potential To Emit (per booth)	421.99	10127.77	1848.32	139.04

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Jasper Seating, Inc.
Plant Location: 932 Mill Street, Jasper, IN. 47574-0231
County: Dubois
Permit Reviewer: Nysa L. James
Date: 03-04-1999

Material	Density (Lb/Gal)	Gal of Mat (gal/hr)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % MIK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIK Emissions (ton/yr)
Sealer	7.8	29.290000	3.80%	23.00%	0.20%	0.90%	0.00%	38.03	230.15	2.00	9.01	0.00
Laquer	7.7	71.480000	10.90%	0.00%	0.00%	2.60%	3.40%	262.77	0.00	0.00	62.68	81.96
Washcoat	7.1	9.600000	1.70%	3.30%	0.00%	0.40%	0.00%	5.08	9.85	0.00	1.19	0.00

Total PTE per booth	**262.77**	**230.15**	**2.00**	**62.68**	**81.96**

The above HAPs' PTE is based on worst case emissions from using any of the above paints.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs